

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**RE: MARY A. GIBSON,  
Debtor**

**Case No.: 11-51827-KMS  
Chapter 13 Proceeding**

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**OBJECTION TO SECURED CLAIM(S) AND FOR OTHER RELIEF**

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COMES NOW the Debtor, MARY A. GIBSON, by and through her Counsel of Record, David L. Lord, Esq., and files this Objection to the following pre-petition Secured Claim(s) and for Other Relief, setting forth the treatment to be provided to Creditor(s) holding security interests in the Debtor's(s') collateral for the purpose of Plan confirmation, to-wit:

**VEHICLE(S) AND PERSONAL PROPERTY**

1. Green Tree  
P.O. Box 6172  
Rapid City, SD 57709

Collateral: 1995 Horton Summit Mobile Home

Position: First Lien

Value: \$15,000.00

Balance: \$22,000.00 the approximate amount believed to be due at the time of filing.

Treatment: Debtor shall pay the value, plus 7% interest, to the Creditor inside the Chapter 13 Plan, and upon payment of same, eliminates any lien. Notwithstanding, the Debtor(s) reserve the right to object to any debt claim amount which exceeds the foregoing figures, reserve the right to object to any assessed fees, costs, or charges included in the Creditor's Proof of Claim, and reserve the right to object to any Amended Proof of Claim assessing post-petition arrears, fees, costs, or charges.

2. Republic Finance  
7535 Airways Blvd., Ste. 210  
Southaven, MS 38671

Collateral: HHG-NPMSI

Position: First Lien

Value: \$500

Balance: \$1,000.00 the approximate amount believed to be due at the time of filing.

Treatment: Debtor shall pay the value, plus 7% interest, to the Creditor inside the Chapter 13 Plan, and upon payment of same, eliminates any lien. Notwithstanding, the Debtor(s) reserve the right to object to any debt claim amount which exceeds the foregoing figures, reserve the right to object to any assessed fees, costs, or charges included in the Creditor's Proof of Claim, and reserve the right to object to any Amended Proof of Claim assessing post-petition arrears, fees, costs, or charges.

WHEREFORE, PREMISES CONSIDERED, the Debtor(s) pray that this Objection to Secured Claim(s) and for Other Relief be received and filed, and that upon consideration by the Court, if no Response is timely filed, or upon hearing in the event of a timely Response, the Court will enter its Order Confirming the Chapter 13 Plan, granting the relief prayed for herein. The Debtor(s) further pray that upon payment of the balance(s) and/or value(s) plus interest on the above-listed claim(s), the lien(s) be canceled and any title document(s) be delivered to the Debtor(s).

RESPECTFULLY SUBMITTED this the 25<sup>th</sup> day August, 2011.

MARY A. GIBSON, Debtor, by:

/s/ David L. Lord  
David L. Lord (G) MS Bar No.: 1427  
David L. Lord and Associates, P.A.  
2300 24<sup>th</sup> Avenue  
Gulfport, MS 39501  
Phone: (228) 868-5667  
Fax: (228) 868-2554  
2 ECF E-mail: [lordlawfirm@bellsouth.net](mailto:lordlawfirm@bellsouth.net)

**CERTIFICATE OF SERVICE**

I, David L. Lord, of David L. Lord and Associates, P.A., Counsel for the above-listed Debtor(s), do hereby certify that I have served, this day, electronically, by the *Notice of Electronic Filing*, or by First-Class U.S. Mail, postage prepaid, a true and correct copy of the above and foregoing *Objection to Secured Claim(s) and for Other Relief* to:

Warren A. Cuntz, Jr., Esq.  
Chapter 13 Trustee  
10585 Three Rivers Road, Suite G  
Gulfport, MS 39503  
[wacuntzcourt@cableone.net](mailto:wacuntzcourt@cableone.net)  
[wcuntz13@cableone.net](mailto:wcuntz13@cableone.net)  
[pdunnaway13@cableone.net](mailto:pdunnaway13@cableone.net)

Green Tree  
P.O. Box 6172  
Rapid City, SD 57709

Republic Finance  
7535 Airways Blvd., Ste. 210  
Southaven, MS 38671

Henry G. Hobbs, Jr., Esq.  
United States Trustee  
501 East Court St, Ste. 6-430  
Jackson, MS 39201  
[USTPRegion05.JA.ECF@usdoj.gov](mailto:USTPRegion05.JA.ECF@usdoj.gov)

Republic Finance  
3200 Mallett Rd.  
Diberville, MS 39540

DATED this the 25<sup>th</sup> day of August, 2011.

/s/ David L. Lord  
David L. Lord (G) MS Bar No.: 1427  
David L. Lord and Associates, P.A.  
2300 24<sup>th</sup> Avenue  
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